

## **REMARKS**

### **Section 112, First Paragraph Rejection**

Claims 1 and 51 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Office Action states that the claims contain subject matter which was not described in the specification in such a way to reasonably convey the application had possession of the invention. In particular, the Office Action indicated that the added features “without electrically connecting to the probe contacts” and that “support means contacts the second side of the substrate” are not described in the specification. This rejection is respectfully traversed.

The language “support means positioned ... without electrically contacting probe contacts” is described beginning in paragraph 0045 of Applicants’ specification, referencing Fig. 3, where it states, “To prevent electrical contact between the spheres 76 and 78 and pads of the LGA on the space transformer substrate 45A, routing of lines 46A is modified in the space transformer 34A relative to Fig. 2 so that no pads are provided in the area where the two added spheres 76 and 78 make contact.” Electrical connection to probes 16 is provided in space transformer 34A through the pads and interconnect lines 46A (none of which contact the spheres 76 and 78).

The fact that spheres 76 and 78 provide support means is described in paragraph 0044, where it states that “additional support is provided using additional support pins 72 and 74 and spheres 76 and 78 (likely made of brass) contacting near the center of the space transformer substrate 45A.”

The additional claim language “support means contacts the second side of the substrate” is supported since the probes 16 contact a first side of the space transformer substrate 34A, while the support spheres 76 and 78 contact the second side of space transformer substrate 34A, as shown in Fig. 3.

Accordingly, Applicants maintain that claims 1 and 51 are allowable under 35 U.S.C. § 112, first paragraph.

### **Claim Objections**

Claims 1 and 5 stand objected to because of informalities. The Office Action states that in claim 1, the support means is recited “without electrically connecting to the probe contact” whereas in its dependent claim 50 the support means is recited to “contact” the second side of the substrate. The Office Action indicates correction is required. This objection is respectfully traversed.

Applicants maintain that the recitations of claims 1 and 50 are consistent and require no amendment. Claim 1 recites “the support means positioned against a second surface,” while claim 50 recites “support means contacts the second side of the substrate within the defined area.” The terms “positioned against” or “contacts” the second side of the substrate are consistent. Claim 1 further claims the “support means positioned against a second surface ... without electrically connecting to the probe contacts.” Claim 50, however, is still consistent with claim 1. As indicated above with reference to Applicants’ Fig. 3 and paragraphs 0044-0045, electrical connections to the probe contacts 16 through substrate 34A are not made by support spheres 76 and 78, even though the support spheres 76 and 78 contact the substrate 34A to provide support.

Based on the above remarks, Applicants respectfully request that the claim objections be withdrawn.

### **Section 102 & 103 Rejections**

The Office Action maintains the previous rejections under 35 U.S.C. § 102 and § 103 from the last Office Action. Namely, Claims 1-4, 6-12 and 50-53 stood rejected under 35 U.S.C. § 102 as being anticipated by Eldridge et al, (U.S. Patent No. 6,438,328, hereafter “Eldridge ‘328”) and Applicants’ admitted prior art of Fig. 2. Further, Claims 5 and 16 stood

rejected as being unpatentable 35 U.S.C. § 103 over Applicants' admitted prior art (Figs. 1-2) in view of Khandros et al (U.S. Patent No. 6,690,185, hereafter "Khandros '185). In response, Applicants incorporate their remarks from the response filed April 25, 2005. Applicants' further respond as follows:

The present Office Action summarized Applicants' previous response as follows: "Applicants argued that (1) claim 1 has been amended to claim a 'support means positioned against a second surface of the substrate substantially opposite said probe contacts without electrically connecting to the probe contact' and that the support means (335) of Eldridge ('328) makes electrical contact with probe contacts, and (2) the support means is claimed to be positioned 'substantially opposite said probe contacts,' but Applicants' Fig. 2, shows the supports identified in the Office Action (particularly 66) that are not substantially opposite the contacts 16."

With respect to Applicants' argument (1), the Office Action disagreed with Applicants' assertion stating the support means (335) of Eldridge ('328) is inherently supported by the mechanical means of Eldridge ('328) and would meet the claimed support means in claim 1.

In response, Applicants traverse this remark. Even if mechanical support is provided by (335) of Eldridge ('328), as stated in the Office Action, the support (335) of Eldridge ('328) still electrically contacts its probes (336) through internal lines of substrate (324). This contrasts with claim 1 which specifically indicates the support means are positioned "without electrically connecting to the probe contacts...." Accordingly Applicants maintain that claim 1 is allowable as not anticipated under 35 U.S.C. § 102 by Eldridge '328.

With respect to Applicants' argument (2), the Office Action stated that Applicants admitted in the instant specification (see page 11, paragraph (0036)) that the probe card of Fig. 3 of the instant application is similar to the conventional probe card of Fig. 2. The Office Action continues indicating, therefore, that all the claimed structural limitations are anticipated by the conventional prior art of Fig. 2.

In response, Applicants traverse this remark. In particular, Applicants object to any indication by the Office Action that Applicants have admitted that the prior art system of Fig. 2 includes more than what is shown by Fig. 2. Applicants are entitled to compare and contrast an invention with the prior art in the detailed description of their application, and this benefits the public as a whole. Assuming any indication that parts of the prior art are “similar” to those used in Applicants’ invention is an admission that the parts are “identical” would prevent a patent applicant from ever comparing and contrasting with the prior art. Although in Applicants’ paragraph 0036 components of Fig. 3 are indicated as being “similar” to Fig. 2, modifications to those components are specifically identified in paragraph 0037, and in subsequent paragraphs. The modifications are discussed in detail with a “first modification” described in paragraph 0038, a “second modification” in paragraph 0039, a “third modification” described in paragraph 0041, and a “fourth modification” in paragraph 0044. Obviously Applicants’ specification read in its entirety does not admit that everything in Fig. 3 is shown identically in Fig. 2. Claims 1-4, 6-12, 14-15 and 50-53 are, thus, believed allowable as not anticipated by Applicants’ prior art of Fig. 2.

In particular, in claim 1, the support means is claimed to be positioned “substantially opposite said probe contacts.” Applicants’ Fig. 2, however shows the supports identified in the Office Action (particularly 66) are not substantially opposite the contacts 16. Instead, the supports 66 are placed against the substrate 45 in an area near the periphery, not “substantially opposite” contacts 16. The supports 66 contact the substrate 45, and are nearly as far away as possible from the area opposite the contacts 16. In contrast, the “fourth modification” specifically mentioned in Applicants’ paragraph 0044 describes supports (76) and (78) in Fig. 3 positioned substantially opposite contacts 16. Accordingly, Applicants maintain that claim 1 is allowable as not anticipated under 35 U.S.C. § 102 by Applicants’ Fig. 2. Claims 2-4, 6-12, 14-15 and 50 are believed allowable based at least on their dependency on claim 1. Claims 51-53 include language indicating supports are provided substantially opposite the probe contacts, as in claim 1, and are thus likewise believed allowable.

### Allowable Claims

Claims 26-31 are indicated by the Office Action as allowed.

Claims 12-13 and 43-46 are objected to as being dependent upon a rejected base claim, but are further indicated as allowable if rewritten in independent form. Claim 43 is an independent claim. Claims 44-46 are, thus, believed allowable in dependent form based on their dependency on claim 43. Claims 12-13 are believed allowable in dependent form based on the allowability of claim 1 as discussed above.

### Conclusion

In light of the above amendments and remarks, claims 1-16, 26-31, 43-46 and 50-53 are now all believed to be in condition for allowance. Accordingly, reconsideration and allowance of these claims is respectfully requested.

No fee is believed due with this response. Should a fee be due, the Commissioner is hereby authorized to charge the fee to Deposit Account No. 06-1325.

Respectfully submitted,

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